

T. E. LANDRY
NOV 24 1976

November 24, 1976

Mr. James D. Shea, President
Safety Projects & Engineering, Inc.
3 Malden Street
West Quincy, MA 02169

Re: Ocean Dumping Permit 76-1

Dear Mr. Shea:

The U.S. Coast Guard has brought to our attention that the location of the "foul dump site" indicated in Paragraph 7 on Page 4 of the referenced permit is in error.

This paragraph should read as follows:

7. The only site which shall be used is the so-called "foul dumping area," a circle about 2 nautical miles in diameter, lying about 9.3 nautical miles northeast of Boston Lighted Horn Buoy "Bravo." Its depth is approximately 50 fathoms. The material shall be dumped at the center of the area at approximately 42° - 24' - 36" N, 70° - 35' - 00" W, which is marked by Massachusetts Foul Area Lighted Buoy "Alpha."

Please correct your permit accordingly. If you have any questions, please call T. E. Landry at (617) 223-5033.

Sincerely yours,

Stuart C. Peterson
Acting Chief
Permits Branch

cc: G. Ciampa
Ocean Dumping Permit Recipients

TEL/CK

U. S. ENVIRONMENTAL PROTECTION AGENCY
John F. Kennedy Federal Building
Boston, Massachusetts 02203

In re
Safety Projects & Engineering, Inc.
3 Malden Street
West Quincy, Massachusetts

76-1

SPECIAL PERMIT FOR OCEAN DUMPING

Pursuant to the authority vested in me by the Marine Protection, Research, and Sanctuaries Act of 1972 (33 U.S.C. 1401-1444) and by applicable EPA regulations (40 CFR Parts 220-227), and after notice and public hearing, the captioned company is hereby granted a special permit for the transportation of certain materials from the United States and for the dumping of these materials into the ocean, subject to the following conditions:

General Conditions

1. Modification or revocation - In accordance with 40 CFR 223.2, this permit may be modified or revoked in whole or in part for cause as follows:
 - a. Violation of any term or condition of the permit;
 - b. Misrepresentation, inaccuracy, or failure to disclose all relevant facts in the permit application;
 - c. Changed circumstances, such as changes in conditions obtaining at the designated dumping site, and newly discovered scientific data relevant to the granting of the permit;
 - d. Failure to keep records, 40 CFR 224.1, or to notify appropriate officials of dumping activities, 40 CFR 224.2.
2. Suspension - In addition to the conditions imposed by paragraph 1 above, this permit may be suspended by the Regional Administrator if he determines that the permitted dumping has resulted, or is resulting, in imminent and substantial harm to human health or welfare or the marine environment. Such suspension shall be effective immediately upon receipt of notification thereof by the permittee, 40 CFR 223.2(b).

3. Hearings - Within 30 days after receipt of notice of revocation or modification pursuant to paragraph 1 or of suspension pursuant to paragraph 2, the permittee or other interested person may request in writing a hearing on the issues raised by any such revocation or suspension. Upon receipt of any such request, the Regional Administrator shall appoint a hearing officer to conduct any hearing as may be required by law.

Special Conditions

1.
 - a. No material collected by the permittee after the issuance of this permit shall be ocean dumped except when no feasible alternative exists for its disposal.
 - b. Potentially labile or reactive materials shall be stabilized before being dumped, unless hazards to safety preclude stabilization.
 - c. This permit does not authorize the transportation or ocean dumping of those materials specifically prohibited by 40 CFR 227.21 or 227.22.
2. Subject to condition 1 above, the cumulative total of materials which may be dumped during the term of this permit shall consist only of the following:
 - a. A maximum of one hundred and twenty 55-gallon drums of sodium and other alkali metals.
 - b. A maximum of fifty 55-gallon drums of damaged or defective Class A, B, and C explosives.
3. Containerization requirements are as follows:
 - a. A list of materials to be encased shall be submitted to EPA prior to encapsulation. A record of the materials encased shall be maintained in accordance with paragraph 13(c) below.
 - b. With the exception of alkali metals, all explosive materials to be dumped shall be encased in concrete inside a metal container. During this procedure a list of materials being so encased shall be compiled. A maximum of twenty 55-gallon drums or the equivalent volume in smaller containers may be dumped during the term of this permit. Minimum density of each container shall be 70 lbs./cu.ft.

- c. Each container shall be clearly and legibly marked on its top, if any, its bottom, and its side with

- (1) the legend "SAFETY PROJECTS, W. Quincy",
- (2) the date of dumping expressed in month and year, and
- (3) a code number unique to the container which bears it.

These markings shall be in a marine paint of a color contrasting with its background and shall be composed of characters no less than one inch in height.

- d. The concrete topping of each container shall also bear the legend "SP" and the same code number required in clause b(3) of this section, inscribed into the concrete prior to its drying in characters no less than two inches in height and one quarter inch deep.

4. Methods of disposal for the materials identified below in clauses a and b shall be as follows:

- a. Alkali metals: The alkali metals and their compounds shall be introduced into the ocean within their containers. The container may be exploded with small arms fire as it floats on the surface. Before the next container is released, the first container shall be completely reacted with the water. A minimum time interval of four minutes shall be maintained between dumping consecutive drums.
- b. Containerized/encased materials: Containers shall be released from the vessel one at a time so as to sink to the bottom. A minimum interval of one minute shall be maintained between dumping consecutive drums. If the drum does not sink, it shall be retrieved, returned to shore, and repackaged for dumping at a later date.
- c. Simultaneous dumping of alkali metals and containerized materials is prohibited.
- d. A maximum of 60 drums of materials (alkali metals and explosives) may be dumped on any one trip.

5. The materials may be transported and dumped at the approved site at a rate not to exceed seven voyages per month.

6. The material shall be transported only from the port of Hingham, Massachusetts, and only in the vessel Mary M, Federal Document Number 274386.

7. The only site which shall be used is the so-called "foul dumping area," a circle about 2 nautical miles in diameter, lying about 9.3 nautical miles northwest of Boston Lightship. The center of the area is at the intersection of lines bearing 56° True from ~~off~~ Boston Lightship and 112° True from Marblehead Light. Its depth is approximately 50 fathoms. The material shall be dumped at the center of the area, approximately 42°-26'N, 70°-35'W. 71°

Mary M. Bay Area 42-25-42
8. a. No materials shall be transported or dumped *Boston Lighted Horn Buoy B "B"*

(1) on Saturdays, Sundays, or holidays; or

(2) during other than daylight hours.

b. No materials may be dumped when

(1) visibility in the immediate vicinity of the vessel Mary M is less than one mile; or

(2) other boat traffic (with the exception of Coast Guard vessels) is within four miles of the vessel Mary M.

9. The permittee shall notify the Coast Guard Captain of the Port of Boston ("COTP") of the estimated time of each departure for the dump site at least 15 days in advance, or within such shorter time period as COTP may in his discretion deem acceptable. The permittee shall also notify COTP of the specific time of each departure as soon as it is known but in no event less than two hours before actual departure. The COTP shall be notified of the number of drums or barrels to be dumped; the number of containers of alkali metals to be reacted; and the number of barrels that are concrete encased. The dump vessel will establish radio contact with COTP and maintain the contact during the dump operation giving position reports as required, dump site arrival time, dump site departure time, and any changes in dumping operation plans. All such notices shall be initiated by telephoning the duty officer at COTP (617/223-6979 or 223-6980) prior to departing for the dump site.

A. Gregg Vazik
C/O Comm. (G-WEP-5)
V.S. E.B.
Wash D.C. 20590

10. The permittee shall allow the Regional Administrator and/or the U. S. Coast Guard, and/or their authorized representatives, upon the presentation of credentials:
 - a. To enter into, upon, or through the permittee's premises, vessels, or other premises or vessels under the control of the permittee, where, or in which, a source of material to be dumped is located or in which any records are required to be kept under the terms and conditions of this permit or the Act;
 - b. To inspect any monitoring equipment or monitoring method required in this permit; or
 - c. To sample or to require that a sample be drawn under EPA/CG supervision of any materials discharged or to be discharged;
 - d. To inspect any dumping, navigation, or electronic surveillance equipment installed on board any towing vessel or self-propelled vessel utilized in ocean dumping activities authorized under this permit.
11. The permittee shall cause to be installed, maintained, and operated on board all towing vessels or self-propelled vessels engaged in dumping activities under this permit such electronic surveillance/navigation equipment as prescribed by the U. S. Coast Guard. Such equipment shall be installed no later than six months after notification of the requirement and shall be operated in accordance with procedures provided by the Coast Guard. No dump vessel will depart on a dumping mission six months after such notification with such equipment not installed or not operational without first obtaining authorization from the Coast Guard.
12. The permittee shall maintain complete records of its ocean dumping activities, which shall be available for inspection by the Regional Administrator of EPA, the Coast Guard Captain of the Port of Boston, or their designee(s). Such records shall contain without limitation the information required by Special Condition 13 below.
13. By the 15th of each month, the permittee shall submit a written report to the U. S. Environmental Protection Agency, John F. Kennedy Federal Building, Boston, Massachusetts 02203 (Attn: Permits Branch). These reports shall include the following information concerning the permittee's ocean dumping activities during the preceding calendar month:

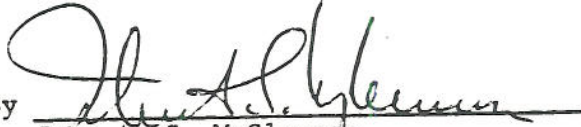
15. This permit must be displayed on the vessel Mary M when it is engaged in dumping.

16. This special permit shall expire on November 1, 1977.

Dated at Boston, Massachusetts, this 24th day of September, 1976.

U. S. ENVIRONMENTAL PROTECTION AGENCY

By


John A. S. McGlenn
Regional Administrator

U. S. ENVIRONMENTAL PROTECTION AGENCY
REGION I
ENFORCEMENT DIVISION, PERMITS BRANCH
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203

Ocean Dumping Public Hearing

Public Notice 76-1

This office has received an application from Safety Projects and Engineering, Incorporated, 3 Malden Street, West Quincy, Massachusetts (the "applicant") for a permit under the Marine Protection, Research, and Sanctuaries Act of 1972. The applicant's sole business, in which it has been engaged for approximately ten years, is the disposal of a variety of substances at sea. The permit applied for would authorize for one year the ocean dumping on a restricted basis of small quantities of a large number of assorted substances.

A. In summary, the application states the following:

1. The material which the applicant proposes to dispose of at sea consists of:

a. An estimated ten 55-gallon drums of neutralized acids and bases.

b. An estimated one hundred and twenty 55-gallon drums of sodium, other alkali metals, and their compounds.

c. An estimated one hundred and seventy 55-gallon drums of: (1) contaminated styrene monomer; (2) damaged or defective Class A, B, and C explosives; and (3) contaminated laboratory equipment, such as machinery, gloves, wipes, masks, filters, tools, and the like; and (4) miscellaneous laboratory reagents, generally in quantities of less than five gallons each, and stored in glass, plastic, or metal containers; and (5) by-products and results of normal operation of chemical laboratories similarly stored. (All laboratory reagents and by-products will be encased in concrete in 55-gallon drums so that each drum contains approximately 12 pounds of waste chemicals).

d. An indeterminate quantity of: (1) spills and debris resulting from fire, explosion, or mishap; and (2) inert materials, such as addressograph plate files, patent models, and the like.

2. The materials would be packed in 55-gallon steel drums and encased in concrete. The dumping would be conducted in such a way as to cause the containers to sink to the bottom, except that violently water reactive materials would be completely reacted or detonated on the surface, usually by gunfire.

3. Each trip to the dump site would include 60 or fewer of these drums, each having a density of no less than 70 pounds per cubic foot.

4. The proposed disposal area is the so-called "Foul Dumpsite," a circle about two nautical miles in diameter, lying about 9.3 nautical miles northeast of Boston Lightship. The center of the area is at the intersection of lines bearing 56° true from Boston Lightship and 112° true from Marblehead Light. Its depth is approximately 50 fathoms.

5. The customary time of departure of the applicant's vessel Mary M from Hingham, Massachusetts, for the dumpsite would be 7:00 a.m., with the arrival at the site at about 9:30 a.m. The actual disposal would ordinarily occupy less than two hours and would occur only during daylight.

6. The applicant states that for these materials alternatives to ocean dumping are non-existent, or significantly more hazardous, or prohibitively more expensive, or unlawful.

B. The Environmental Protection Agency has made a tentative decision to issue a permit subject to strict limitations. However, a public hearing will be held prior to making a final determination. The hearing will begin at 10 a.m., July 13, 1976 in Room 2109 of the John F. Kennedy Federal Building, Government Center, Boston, Massachusetts.

C. The Environmental Protection Agency proposes to insert the following conditions into the proposed permit.

1.
 - a. No material collected by the permittee after the issuance of this permit shall be ocean dumped except when no feasible alternative exists for its disposal.
 - b. Neither readily reclaimable solvents nor bulk solvents shall be ocean dumped.
 - c. Potentially labile or reactive materials shall be stabilized before being dumped, unless hazards to safety preclude stabilization.
 - d. Acids and alkalis shall be neutralized before ocean dumping, if at all feasible.
 - e. This permit does not authorize the transportation or ocean dumping of those materials specifically prohibited by 40 CFR 227.2.

2. Subject to condition 1 above, the cumulative total of materials which may be dumped during the term of this permit shall consist only of the following:

- a. An estimated ten 55-gallon drums of neutralized acids and bases.
- b. An estimated one hundred and twenty 55-gallon drums of sodium, other alkali metals, and their compounds.

c. An estimated one hundred and seventy 55-gallon drums of:

- (1) contaminated styrene monomer;
- (2) damaged or defective Class A, B, and C explosives;
- (3) contaminated laboratory equipment, such as machinery, gloves, wipes, masks, filters, tools, and the like;
- (4) miscellaneous laboratory reagents, generally in quantities of less than five gallons each, and stored in glass, plastic, or metal containers; and
- (5) by-products and results of normal operation of chemical laboratories similarly stored. (All laboratory reagents and by-products will be encased in concrete in 55-gallon drums so that each drum contains approximately 12 pounds of waste chemicals.)

d. An indeterminate quantity (not to exceed the equivalent of 10 drums) of:

- (1) spills and debris resulting from fire, explosion, or mishap; and
- (2) inert materials, such as addressograph plate files, patent models, and the like.

3. This special permit shall expire on August 1, 1977.

4. The materials may be transported and dumped at the approved site at a rate not to exceed seven voyages per month.

5. The material shall be transported only from the port of Hingham, Massachusetts, and only in the vessel Mary M, Federal Document Number 274386.

6. The only site which shall be used is the so-called "foul dumping area," a circle about 2 nautical miles in diameter, lying about 9.3 nautical miles northwest of Boston Lightship. The center of the area is at the intersection of lines bearing 56° True from Boston Lightship and 112° True from Marblehead Light. Its depth is approximately 50 fathoms. The material shall be dumped at the center of the area, approximately 42°-26'N, 70°-35'W.

7. a. No materials shall be transported or dumped

- (1) on Saturdays, Sundays, or holidays; or
- (2) during other than daylight hours.

b. No materials may be dumped when

- (1) visibility in the immediate vicinity of the vessel Mary M is less than one mile; or
- (2) other boat traffic (with the exception of Coast Guard vessels) is within four miles of the vessel Mary M.

8. The permittee shall notify the Coast Guard Captain of the Port of Boston (COTP) of the estimated time of each departure for the dump site at least 15 days in advance, or within such shorter time period as COTP may in his discretion deem acceptable. The permittee shall also notify COTP of the specific time of each departure as soon as it is known but in no event less than two hours before actual departure. The COTP shall be notified of the number of drums or barrels to be dumped; the number of sodium, potassium, and magnesium barrels to be ignited; the number of barrels that are concrete encased; and the number of barrels of liquid caustic or acid to be poured over the side. The dump vessel will establish radio contact with COTP and maintain the contact during the dump operation giving position reports as required, dump site arrival time, dump site departure time, and any changes in dumping operation plans. All such notices shall be initiated by telephoning the duty officer at COTP (617/223-6977) prior to departing for the dump site.

9. Methods of disposal shall be as follows:

- a. Alkali metals. The alkali metals and their compounds shall be introduced into the ocean within their containers. The container may be exploded with small arms fire as it floats on the surface. Before the next container is released, the first container shall be completely reacted with the water. A minimum time interval of 10 minutes must be maintained between dumping consecutive drums.
- b. Containerized encased materials. Containers shall be released from the vessel one at a time so as to sink to the bottom. A minimum interval of 5 minutes must be maintained between dumping consecutive drums. If the drum does not sink, it must be retrieved, returned to shore, and repackaged for dumping at a later date.
- c. Neutralized acid-alkali liquids. These liquids shall be introduced into the ocean by pouring from the transporting container at the side of the vessel while it is underway. The vessel must be moving in excess of 5 knots, and the dumping of a 55-gallon drum shall not take less than five minutes.

- d. Large decontaminated machinery. Large pieces of machinery shall be released from the vessel one piece at a time so as to sink to the bottom.
- e. Simultaneous dumping of various types of materials (a, b, c, and d above) is prohibited.
- f. Written approval must be obtained for any other type of disposal not defined above.

10. Containerization requirements are as follows:

- a. With the exception of alkali metals, neutralized acid-alkalis, and large pieces of decontaminated machinery, all materials to be dumped shall be encased in concrete inside a metal container. During this procedure, a list of materials being so encased shall be compiled. A maximum of one hundred and seventy 55-gallon drums or the equivalent volume in smaller containers may be dumped during the term of this permit. Minimum density of each container shall be 70 lbs./cu. ft.

- b. Each container shall be clearly and legibly marked on its top, if any, its bottom, and its side with

- (1) the legend "SAFETY PROJECTS, W. Quincy",
- (2) the date of dumping expressed in month and year, and
- (3) a code number unique to the container which bears it.

These markings shall be in a marine paint of a color contrasting with its background and shall be composed of characters no less than one inch in height.

- c. The concrete topping of each container shall also bear the legend "SP" and the same code number required in clause b(3) of this section, inscribed into the concrete prior to its drying in characters no less than two inches in height and one quarter inch deep.

11. By the 15th of each month, the permittee shall submit a written report to the U. S. Environmental Protection Agency, John F. Kennedy Federal Building, Boston, Massachusetts 02203 (Attn: Permits Branch). These reports shall include the following information concerning the permittee's ocean dumping activities during the preceding calendar month:

- a. A list of all materials collected by the permittee for the purpose of ocean dumping. Such list shall show the quantity of each material collected and identify the source from whom it was collected.

- b. The date and time of each voyage made for the purpose of ocean dumping.
- c. The code number of each container dumped, together with a description of its contents (including the chemical name and quantity) and the date of its dumping.
- d. The chemical name and quantity of any other material ocean dumped (neutralized acids and alkalis, alkali metals, and large pieces of machinery), together with the date of dumping.
- e. A certification by the permittee's agent, as follows:

I certify that, on (date of inspection), at (place of inspection), I inspected (number) containers, bearing code numbers _____, prior to the ocean disposal of these containers and of their contents pursuant to the ocean dumping permit issued to Safety Projects & Engineering, Inc.; that each of these containers was packed in compliance with the applicable requirements of that permit, including, without limitation, the requirement for concrete ballast; and that at the time of their ocean disposal, each of these containers complied with these requirements.

Signed this _____ day of _____, 19____, under the pains and penalties of law, 18 USC 1001.

SAFETY PROJECTS & ENGINEERING, INC.

By: (signature of authorized agent)
(printed name of above agent)

- 12. The permittee shall take such steps as are required (1) to effect a continuing reduction of the quantities and toxicities of materials which it dumps into the ocean pursuant to this permit, and (2) to develop a land-based disposal alternative to the ocean dumping of those materials for which such an alternative is reasonably available.
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13. The permittee shall maintain complete records of its ocean dumping activities, which shall be available for inspection by the Regional Administrator of EPA, the Coast Guard Captain of the Port of Boston, or their designee(s). Such records shall contain without limitation the information required by Special Condition 11 above.
 14. The permittee shall allow the Regional Administrator and/or the U. S. Coast Guard, and/or their authorized representatives, upon the presentation of credentials:
 - a. To enter into, upon, or through the permittee's premises, vessels, or other premises or vessels under the control of the permittee, where, or in which, a source of material to be dumped is located or in which any records are required to be kept under the terms and conditions of this permit or the Act;
 - b. To inspect any monitoring equipment or monitoring method required in this permit; or
 - c. To sample or require that a sample be drawn under EPA/CG supervision of any materials discharged or to be discharged;
 - d. To inspect any dumping, navigation, or electronic surveillance equipment installed on board any towing vessel or self-propelled vessel utilized in ocean dumping activities authorized under this permit.
 15. The permittee shall cause to be installed, maintained, and operated on board all towing vessels or self-propelled vessels engaged in dumping activities under this permit such electronic surveillance/navigation equipment as prescribed by the U. S. Coast Guard. Such equipment shall be installed no later than six months after notification of the requirement and shall be operated in accordance with procedures provided by the Coast Guard. No dump vessel will depart on a dumping mission six months after such notification with such equipment not installed or not operational without first obtaining authorization from the Coast Guard.
 16. This permit must be displayed on the vessel Mary M when it is engaged in dumping.
- D. Any person may obtain further information on the proposed dumping, including copies of any relevant documents, by telephoning or visiting T. E. Landry at the Environmental Protection Agency, Enforcement Division, 21st Floor, John F. Kennedy Federal Building, Boston, Massachusetts 02203 (telephone number 617/223-5061) between the hours of 9:00 a.m. and 4:30 p.m., Monday thru Friday.

Leslie Carothers, Director
Enforcement Division